

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PAUL MOORE,

Plaintiff,

v.

JEFFERIES & CO., INC.,

Defendant.

Civil Action No. 08 CV 3

**Judge Blanche M. Manning
Magistrate Judge Maria Valdez**

**DEFENDANT JEFFERIES & COMPANY, INC.'S MOTION FOR A THIRTY DAY
EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S DISCOVERY REQUESTS**

Defendant Jefferies & Company, Inc. ("Jefferies"), through undersigned counsel, respectfully files this motion to enlarge the time to respond to plaintiff Paul Moore's First Set of Requests for Production of Documents and First Set of Interrogatories by thirty days, to May 31, 2008. In support, Jefferies provides the following:

1. Jefferies filed a motion to dismiss plaintiff Moore's complaint on Feb. 6, 2008. (Dkt. No. 13.) Briefing on that motion was completed on March 25, 2008. (Dkt. No. 19.) That motion to dismiss is currently pending before the Court.
2. On April 1, 2008, plaintiff Moore served Jefferies' counsel with Moore's First Set of Requests for Production of Documents and First Set of Interrogatories.
3. Pursuant to Federal Rules of Civil Procedure 33 and 34, Jefferies' response to this discovery is due by May 1, 2008.

4. Jefferies believes that it will not be able to adequately respond to Moore's discovery requests by May 1, 2008. Accordingly, Jefferies desires to extend this deadline by thirty days, to May 31, 2008.

5. Jefferies' counsel has conferred with Moore's counsel and requested a thirty-day extension of time to respond to Moore's discovery requests. Moore's counsel would not consent to such an extension unless Jefferies agreed that it would not later seek to stay discovery pending resolution of Jefferies' motion to dismiss. (Ex. A, 4/21/08 e-mail from M. Dickler to J. Daly.) Jefferies is unwilling to forego any right it may have to seek a stay of discovery at a later time. Thus, the parties could not reach an agreement regarding Jefferies' proposed extension of time to respond to discovery.

For the above reasons, Jefferies respectfully requests that this motion be granted, and that Jefferies' time to respond to plaintiff Paul Moore's First Set of Requests for Production of Documents and First Set of Interrogatories be enlarged to May 31, 2008.

Dated: April 24, 2008

Respectfully submitted,

/s/ James R. Daly

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Attorneys for Defendant Jefferies & Company, Inc.

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on April 24, 2008, I electronically filed the foregoing Defendant Jefferies & Company, Inc.'s Motion for a Thirty Day Extension of Time to Respond to Plaintiff's Discovery Requests with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following at their e-mail address on file with the Court:

Bruce S. Sperling
Michael G. Dickler
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/s/ Nicole C. Henning

One of the Attorneys for Defendant Jefferies & Co., Inc.